

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

TERSHAUD SAVORYEA ROSE,

Plaintiff,

v.

CENTRA HEALTH, INC., *et al.*,

Defendants.

Case No. 6:17-cv-12

**MOTION FOR A PROTECTIVE ORDER PROHIBITING PLAINTIFF
FROM ENGAGING IN *EX PARTE* COMMUNICATION WITH CENTRA'S
CURRENT AND FORMER EMPLOYEES**

Defendant Centra Health, Inc. ("Centra") submits this Motion for a Protective Order Prohibiting Plaintiff From Engaging in *Ex Parte* Communication With Centra's Current and Former Employees (the "Motion") pursuant to Federal Rule of Civil Procedure 26(c). As discussed in Plaintiff's accompanying memorandum in support of this Motion, Plaintiff seeks to engage in communications with former employees of Centra without taking adequate precaution to prevent the disclosure of privileged or confidential information and seeks to publish a website which may result in current and former employees providing privileged and confidential information.

Centra respectfully requests that the Court grant its Motion for the reasons set forth in the accompanying memorandum. Centra certifies that it has attempted to resolve this issue in good faith without Court intervention prior to filing this Motion.

Respectfully,

CENTRA HEALTH, INC.

By: /s/F. Elizabeth Burgin Waller
Of Counsel

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Counsel for Defendant Centra Health, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2017, I caused the foregoing document to be filed electronically using the CM/ECF system, which will send notification of the filing all counsel of record.

/s/F. Elizabeth Burgin Waller